



**MEMO ENDORSED**

**CONFIDENTIAL COMMUNICATION: ALL RIGHTS AND PRIVILEGES RESERVED**

Application GRANTED. Defendants' deadline to file its Proposed Additional Findings of Fact and Conclusions of Law is extended to **January 8, 2024**. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 160.

January 6, 2024

**VIA ECF**

Honorable Jessica G.L. Clarke  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street – Courtroom 20C  
New York, NY 10007-1312

Dated: January 8, 2024  
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads 'Jessica Clarke'.

JESSICA G. L. CLARKE  
United States District Judge

Re: *MAve Hotel Investors LLC, d/b/a The MAve Hotel et al. v. Certain Underwriters at Lloyd's, London, and HDI Global Specialty SE individually and severally subscribed to Commercial Property Insurance Policy No. DCESP01372-02*  
Docket No.: 1:21-cv-08743 (JGLC)(JLC)  
**Request for Extension of Time**

Dear Judge Clarke:

Our office represents Defendants, Certain Underwriters at Lloyd's, London, and HDI Global Specialty SE individually and severally subscribed to Commercial Property Insurance Policy No. DCESP01372-02, in the above-referenced matter. We submit this Letter Motion in accordance with Section 2(a) of your Honor's Local Rules to Request an Extension of Time to file Defendants' Proposed Additional Findings of Fact and Conclusions of Law to Monday, January 8, 2024.

Defendants have filed all required documents in accordance with the Scheduling Order, with the exception of Defendants' Proposed Additional Findings of Fact and Conclusions of Law pursuant to Rule 1.e.i of the Court's Individual Trial Rules and Procedures. Per your Honor's Scheduling Order, this document was due to be filed on January 5, 2024.

Our reading of the Court's Individual Trial Rules implied to us that only a joint statement of proposed findings of fact and conclusions of law should be submitted, assuming the parties all agreed on same, rather than individual statements. The parties did agree on a Joint Proposed Findings of Fact and Conclusions of Law, which was timely filed on January 5, 2024 [Dkt No. 153]. We now respectfully request permission to file Defendants' Proposed Additional Findings of Fact and Conclusions of Law, which can be filed without further delay as the document is already drafted and ready to file.

Both Plaintiff and Plaintiff-Intervenor consent to this request. This is Defendants' first request for an extension. The next scheduled appearance before this Honorable Court is on January 22, 2024.

Respectfully submitted,

FLEISCHNER POTASH LLP

A handwritten signature in blue ink, appearing to read "Daniel P. Stewart", with a stylized flourish.

Daniel P. Stewart  
[dstewart@fp.law](mailto:dstewart@fp.law)

A handwritten signature in blue ink, appearing to read "Eric R. Leibowitz", with a stylized flourish.

Eric R. Leibowitz  
[eleibowitz@fp.law](mailto:eleibowitz@fp.law)

ERL

cc: All Counsel (Via ECF)